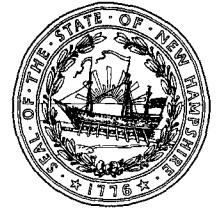




The State of New Hampshire
Department of Environmental Services



Michael P. Nolin
Commissioner

August 15, 2005

LETTER OF DEFICIENCY #WSEB 05-123
Certified Mail # 7099 3400 0003 0691 2465

Brad Meade
Town of New Castle
PO Box 367
New Castle, NH 03854

Subject: New Castle – Public Water System: New Castle Water Works (EPA# 1661010)

Dear Mr. Meade:

The records of the NH Department of Environmental Services (DES) show that the New Castle Water Works (NCWW) water system is classified as a public water system (PWS), as defined by RSA 485:1-a. A PWS is defined as any water system supplying 15 or more services, or 25 or more people for 60 or more days per year. NCWW distributes drinking water to which sodium hypochlorite has been added as a disinfectant to provide bacteriological protection to consumers. As a result, NCWW is required to submit water samples for Total Trihalomethanes (TTHM) analysis to the State laboratory or a State-certified laboratory in compliance with NH Administrative Rule Env-Ws 382, *Disinfectant/Disinfection Byproducts Rule*.

Pursuant to Env-Ws 317.70, the maximum contaminant level (MCL) for TTHMs is 0.080 mg/L. Pursuant to Env-Ws 382.16, compliance with the MCL for TTHMs is determined by calculating the running annual average, computed quarterly, of quarterly averages of all samples collected. The NCWW's running annual average for TTHMs was 0.116 mg/L for the fourth quarter of 2004 (Q4-04), 0.097 mg/L for Q1-05, and 0.095 mg/L for Q2-05. Thus the water system has incurred TTHM MCL violations for three consecutive quarters. Although NCWW obtains all of its drinking water from Portsmouth Water Works, it is ultimately NCWW's responsibility to undertake actions, alone or in concert with Portsmouth Water Works, necessary to provide customers with drinking water that meets water quality standards.

DES believes the MCL violations can be corrected and future violations prevented by taking the following actions:

1. **By September 16, 2005**, retain the services of a qualified consultant to address the water quality violations and notify DES, in writing, of the name of the consultant hired. The consultant should review all existing water quality data and all feasible options prior to making recommendations to the owner for correcting the MCL violations; and

2. **By November 18, 2005**, submit to DES a consultant's report, which shall contain the consultant's evaluation of feasible options, cost estimates, identification and justification of which option the owner has selected to implement, along with a timeline and final correction date to resolve the MCL violations. A maintenance schedule must be included if treatment is proposed. DES will approve the consultant's report, in writing, and specify the next submission deadline, if applicable. A consultant's report determined to lack comprehensiveness will not be approved; and
3. **By the DES submission date established in the above-mentioned approval letter** (if applicable), submit to DES all engineering/technical documents for the design of the selected option. DES must review and approve, in writing, any engineering/technical documents prior to the commencement of any work on the system. Note that engineering plans for systems serving more than 50 service connections or 20,000 gpd must be stamped by a professional engineer; and
4. **By the DES-approved correction date**, take the corrective action as approved by DES. Notify DES in writing upon completion of the action(s) taken.

In the event compliance is not achieved within this period. DES may initiate formal action against the NCWW, including issuing an order requiring the deficiencies to be corrected, initiating an administrative fine proceeding, and/or referring the matter to the NH Department of Justice for imposition of appropriate penalties.

**All information as requested above should be addressed as follows
or faxed to (603) 271-5171:**

Robert Mann
Department of Environmental Services
Water Supply Engineering Bureau
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095

Please be reminded that proposed treatment alternatives should take into consideration all water quality parameters as well as current and future quantity needs. In addition to your operator, assistance may be available to you through a variety of sources. DES staff member Robert Mann, P.E., may be able to answer questions concerning treatment for TTHMs. He may be reached at (603) 271-2953 or via email at rmann@des.state.nh.us. Health related questions may be directed to Dave Gordon of the DES Bureau of Environmental and Occupational Health whose number is (603) 271-4608. If you have any questions regarding this letter, please contact Alan Leach at (603) 271-2854 or by email at aleach@des.state.nh.us.

Letter of Deficiency #WSEB 05-123

New Castle Water Works

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Sincerely,

COPY
Sarah Pillsbury, P.G., Administrator
Water Supply Engineering Bureau

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cc: Gretchen R. Hamel, DES Legal Unit Administrator
Malcolm Rosenson, New Castle Health Officer
Brian Goetz, Primary Operator
EPA, Region I

cc: Robert Mann, DES
Dave Gordon, DES BEOH